

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SANDRA SARNOWSKI,

Defendant.

Case:2:16-cr-20183  
Judge: Goldsmith, Mark A.  
MJ: Patti, Anthony P.  
Filed: 03-17-2016 At 10:18 AM  
INFO USA V. SARNOWSKI (DA)

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**INFORMATION**

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THE UNITED STATES ATTORNEY CHARGES:

**COUNT ONE**

*18 U.S.C. § 641 – Theft of Government Funds*

SANDRA SARNOWSKI

Beginning in or around November 1998 and continuing through August 2013, in the Eastern District of Michigan, Southern Division, Defendant SANDRA SARNOWSKI, willfully and knowingly did embezzle, steal, purloin, and convert to her use money of the Social Security Administration, a department or agency of the United States, to wit: Social Security Act, Title II, Retirement Insurance Program benefits having a value greater than \$1000.00; in violation of Title 18, United States Code, Section 641.

**FORFEITURE ALLEGATIONS**

*18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461*

The allegations contained in Count One of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461(c).

Upon conviction of the offense in violation of Title 18, United States Code, Section 641 set forth in Count One of this Information, the defendant, SANDRA SARNOWSKI, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), together with Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

The United States intends to seek a money judgment against defendant. Upon conviction of a violation of Title 18, United States Code, Section 641, as charged in the Information, defendant SANDRA SARNOWSKI, shall be ordered to pay a sum of money equal to at least **\$308,306.00** in United States Currency, representing the amount of proceeds that she obtained as a result of the offense.

All pursuant to 18 U.S.C. § 981(a)(1)(C), together with 28 U.S.C. § 2461(c).

BARBARA L. MCQUADE  
United States Attorney

s/John K. Neal  
JOHN K. NEAL  
Assistant U.S. Attorney  
Chief, White Collar Crime Unit

s/Ryan A. Particka  
RYAN A. PARTICKA  
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Bar No. IL-6302714

Dated: March 17, 2016

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United States District Court  
 Eastern District of Michigan

## Criminal Case Cover

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

**Reassignment/Recusal Information** This matter was opened in the USAO prior to August 15, 2008 [ ]

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>RAP</u>

Case Title: USA v. SANDRA SARNOWSKI

County where offense occurred : OAKLAND

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

       Indictment/ ☒ Information --- no prior complaint.

       Indictment/        Information --- based upon prior complaint [Case number: ]

       Indictment/        Information --- based upon LCrR 57.10 (d) [Complete Superseding section below]

## Superseding Case Information

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Original case was terminated; no additional charges or defendants.  
☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

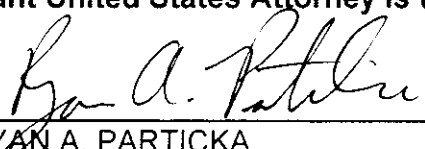
Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

March 17, 2016

Date

  
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 Special Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.